

AO 91 (Rev 8/01) Criminal Complaint

## United States District Court

SOUTHERN

DISTRICT OF  
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA  
V.

Abel Yepez-Borrego

United States Courts  
Southern District of Texas  
FILED

February 15, 2022

## CRIMINAL COMPLAINT

Case Number: M-22-0323-M

Nathan Ochsner, Clerk of Court

IAE  
Mexico  
(Name and Address of Defendant)

YOB: 1993

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my

knowledge and belief. On or about February 14, 2022 in Starr County, inthe Southern District of Texas

(Track Statutory Language of Offense)

the defendant being then and there an alien who had previously been deported from the United States to Mexico in pursuance of law, and thereafter was found near Rio Grande City, Texas, within the Southern District of Texas, the Attorney General of the United States and/or the Secretary of Homeland Security, not theretofore having consented to a reapplication by the defendant for admission into the United States;

in violation of Title 8 United States Code, Section(s) 1326 (Felony)I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

Abel Yepez-Borrego was encountered by Border Patrol Agents near Rio Grande City, Texas on February 14, 2022. The investigating agent established that the defendant was an undocumented alien and requested record checks. The defendant claims to have illegally entered the United States on February 14, 2022, near Rio Grande City, Texas. Record checks revealed the defendant was formally Deported/Excluded from the United States on February 7, 2019, through Hidalgo, Texas. Prior to Deportation/Exclusion, the defendant was instructed not to return to the United States without permission from the U.S. Attorney General and/or the Secretary of Homeland Security.

On January 16, 2019, the defendant was convicted of 8 USC 1326 Illegal Re-Entry and sentenced to six (6) months confinement.

Continued on the attached sheet and made a part of this complaint:

☐ Yes ☒ No

Complaint authorized by AUSA Colton Turner

Submitted by reliable electronic means, sworn to and attested  
telephonically per Fed. R. Cr.P.4.1, and probable cause found on:

February 15, 2022 7:19 AM

Nadia S. Medrano, U.S. Magistrate Judge  
Name and Title of Judicial Officer/s/ Cynthia Garcia  
Signature of Complainant

Cynthia Garcia Border Patrol Agent

Signature of Judicial Officer